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March 6, 2007

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room TW-A325  
Washington, DC 20554

FILED/ACCEPTED  
MAR - 8 2007  
Federal Communications Commission  
Office of the Secretary

Re: **Sunset of AMPS Requirement**  
**WT Docket No. 01-108 and RM 11355, Ex Parte Submission**

Dear Ms. Dortch

United States Cellular Corporation ("USCC"), a party in the above referenced proceeding, hereby comments on certain allegations made in the proceeding by the **Alarm** Industry Communications Committee ("AICC") in its original Petition for Rulemaking ("Petition") and reply comments, which evidently have been referred to recently in conversations between other parties to this proceeding and FCC staff members.

AICC's Petition (pp. 13-14) states as follows:

"However, there are certain areas in which there is poor digital cellular coverage leaving no alternative to the AMPS radios. For instance, several locations in Virginia, Iowa, Illinois, Connecticut, and Arizona have been identified where the digital coverage is significantly inferior to analog coverage, including Peoria and Dunlap, Illinois; West Hartford and Old Greenwich, Connecticut; Roanoke, Virginia; Des Moines, Iowa; and portions of Arizona. In these areas installation of digital [alarm] equipment would lead to poor or no service putting alarm customers at risk that their signal could not be transmitted."

USCC, through subsidiaries, provides A block analog and CDMA digital cellular service in the Des Moines, Iowa; Peoria, Illinois and Roanoke, Virginia MSAs, locations referred to by AICC in its pleadings. The Des Moines MSA is comprised of Dallas, Polk and Warren counties. USCC now has 15 base stations providing CDMA service in Dallas County, 56 base stations in Polk County, and 11 cells in Warren County. The Peoria MSA includes Peoria, Tazewell, and

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Woodford counties. USCC's cells providing CDMA digital service in those counties number 27, 7 and 15 respectively. Lastly, the Roanoke MSA is comprised of Botetourt County, Craig County, Roanoke County, Roanoke City, and Salem City. The number of cells providing CDMA digital coverage in those jurisdictions is 5, 1, 10, 14, and 3 respectively. USCC's CDMA signal contour covers all of those MSAs and is fully equal to its current analog coverage.

USCC has argued, as have other wireless carriers, that the analog sunset should not be extended. But however the Commission resolves the overall sunset issue, an alleged lack of CDMA digital coverage as compared with analog service in the counties referred to above should not be a reason for extending the sunset.

Very truly yours,

A handwritten signature in black ink, appearing to read "Peter M. Connolly", with a long horizontal flourish extending to the right.

Peter M. Connolly

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